

April 15, 2016

Dianne Thomas
REC Program
Inactive Hazardous Sites Branch
Superfund Section
North Carolina Department of Environmental Quality
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

**Subject: Registered Environmental Consultant (REC) Program
Quarterly Letter Status Report
Phase II Remedial Investigation (RI) Work Plan Addendum
Portion of Stanley Fastening
Sanford, Lee County, North Carolina
NCDENR Site ID #NONCD0002531**

Dear Ms. Thomas,

AECOM North Carolina, Inc. (AECOM), on behalf of Stanley, Black & Decker, Inc. (SBD) has prepared this Quarterly Letter Status Report Addendum to the Phase II Remedial Investigation (RI) Work Plan (AECOM, 2014) to present additional proposed assessment activities to complete the RI. SBD has obtained an off-site access agreement from the City of Sanford, North Carolina for construction of the proposed wells to delineate the vertical and horizontal extent of the contaminants of concern. The proposed well installation locations and procedures are presented below.

Background

A Phase II Remedial Investigation Work Plan (RIWP) was prepared by AECOM North Carolina, Inc. (AECOM, 2014) for a portion of the former Stanley Fastening facility located at 2903 Lee Avenue, Sanford, Lee County, North Carolina. This work is being performed under Administrative Agreement (AA) number 11-SF-343, which was executed on October 28, 2011 between SBD and the North Carolina Department of Environment and Natural Resources (NCDENR), Division of Waste Management (DWM) Superfund Section, Inactive Hazardous Sites Branch (IHSB). The executed AA defines the Site as *"the contaminated area resulting from the release, disposition, deposit, placement, or discharge of one or more hazardous substances at and/or near the metals cutting bin and/or the five broach pits, previously identified as Groundwater incident No. 18466, on the property at 2903 Lee Avenue in Lee County, North Carolina and currently owned by Static Control Components, Inc. and any other area or property to which the contamination from that release, disposal, deposition, placement, or discharge has come to be located."*

The assessment activities specified in the Phase II RIWP were completed during April 2014 and included installation of off-site groundwater monitoring wells MW-23 (2980 Lee Ave.), MW-24 (2885 Lee Ave.), MW-25 (2980 Lee Ave.) and MW-26 (2980 Lee Ave.) However, groundwater monitoring data from these wells indicated that the vertical and horizontal extent of contaminants including tetrachloroethylene, 1,1-dichloroethylene, and 1,4-dioxane was not defined to levels below the North Carolina Groundwater standards. Based on these findings, permission to install additional off-site monitoring wells was requested from a number of surrounding property owners, but these owners did not grant access. The City of Sanford, North Carolina did agree to provide access to a roadway

right-of-way where the monitoring wells could be installed. Therefore, this Addendum to the Phase II RIWP presents additional off-site groundwater well installation and monitoring procedures in order to complete the RI.

Proposed Sampling Program

The following sections describe the proposed sampling and analytical methods and monitoring well locations for the RI field program. **Figure 1** shows the proposed sample locations adjacent to Keith Drive. Sampling methods and protocols that were referenced and used during prior Remedial Investigation Work Plan sampling events will generally be followed, as applicable (AECOM, 2014). A private utility locator will be used to locate buried utilities prior to advancing any subsurface borings. After the proposed monitoring wells are installed, a licensed surveyor will survey each well for elevation and location and the Site survey map will be updated.

Additional Monitoring Well Installation and Sampling

Groundwater data collected in May 2015 indicate that the horizontal and vertical extent of the VOC plume is not delineated to the North Carolina Groundwater Standards (2L Standards) for VOCs in the shallow (overburden) and deeper (upper bedrock and intermediate bedrock) aquifer zones. However, contaminant concentrations were at or near the respective 2L Standards in several wells. Therefore, monitoring wells MW-1, MW-5, MW-14, MW-15, MW-16, MW-20, MW-21, MW-22, MW-23, MW-24, MW-25, and MW-26 will be sampled to determine whether delineation can be achieved with the existing monitoring well network. If necessary, new permanent wells will be installed in an effort to delineate the horizontal and vertical extent of groundwater impacts.

Based on existing site data, it is expected that three additional wells will be installed at the off-site road right-of-way location. As shown on Figure 1, the wells will include three bedrock wells (upper, intermediate and deep bedrock). Locations and construction details for the new wells will be based on results from the above-described sampling, existing well completions and conditions encountered during well installation activities. The new wells will be installed using roto-sonic drilling techniques. Bedrock monitoring wells will be installed with temporary outer casing installed approximately 5 feet into bedrock and may be installed as a nested pair or set. Each well will be constructed of 2-inch diameter polyvinyl chloride (PVC) casing and approximately 10 feet of PVC screen.

Each of these wells will be sampled for the specific VOCs (EPA Method 8260) and SVOCs (EPA Method 8270) identified as Constituents of Potential Concern (COPCs) in Table 1 and 2 in the Phase II RIWP (AECOM, 2014).

Groundwater samples will be collected using low-flow sampling techniques in accordance with EPA and AECOM standard SOPs. Prior to sampling, groundwater elevation measurements will be recorded from each Site monitoring well. The data will be used to develop groundwater potentiometric maps for the Site. Depth-to-water measurements will be performed in accordance with the EPA and AECOM procedures. All field and sample management procedures will be the same as those specified in the Phase II RIWP (AECOM, 2014).

Analytical Parameters and Methods

Groundwater samples will be analyzed by the following methods:

- Constituents of Potential Concern VOCs by EPA SW846 Method 8260; and
- Constituents of Potential Concern SVOCs by EPA SW846 Method 8270.

Quality control samples and procedures will be the same as those specified in the Phase II RIWP (AECOM, 2014).

Site Survey

Following completion of the remedial investigation work, groundwater monitoring well locations will be surveyed by a North Carolina licensed land surveyor. The data from this survey will be used to update the existing site plan.

Investigation Derived Waste Disposal

Investigation derived waste (IDW) (soil, groundwater, etc.) will be managed in accordance with A.6.2.g of the *Registered Environmental Consultant Program Implementation Guidance*. IDW will be drummed, appropriately labeled, sampled, and staged at the former SBD plant site (now Static Control Components) pending laboratory analysis and subsequent waste characterization. AECOM will assist SBD in selecting a disposal contractor and in identifying an appropriate disposal facility.

Remedial Investigation Report

Following completion of field work for the Remedial Investigation, AECOM will prepare a Remedial Investigation Report that meets the requirements of .0306h of the *Registered Environmental Consultant Program Implementation Guidance*.

The report is expected to include the following items:

- Introduction
 - Site Chronology
 - Background
 - Objectives
- Field Investigation Procedures and Results
- Vapor Intrusion Evaluation
- Recommendations and Follow-Up Actions

The report will include maps, figures, tables, checklists, photos of Site conditions, and other attachments as needed to support the report findings.

Schedule

The following updated schedule is estimated for completing the Addendum of the Phase II RI Work Plan and submittal of the RI Report. This schedule is contingent on property access, subcontractor availability, weather and other factors that could alter the work schedule. Additional schedule changes or updates will be provided in separate correspondence or progress reports.

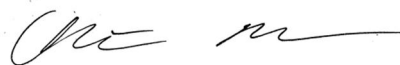
Work Item/Milestone	Estimated Start Date	Estimated Completion or Delivery Date
Sample existing monitoring wells and evaluate need for additional wells	April 2016	May 2016
Install additional off-site groundwater monitoring wells and conduct sampling (if necessary)	May 2016	June 2016
Review, validate and compile final lab data	June 2016	July 2016
Develop RI Report	July 2016	August 2016
Submit RI Report	--	August 15, 2016

If you have any questions regarding this quarterly letter status report, please feel free to contact me by phone at 919-461-1214 or by email at bill.bremen@aecom.com.

Yours sincerely,



William M. "Bill" Bremen, P.E., RSM
Registered Site Manager
Bill.bremen@aecom.com



Christopher Mason
Staff Scientist

cc: Kathryn E. Hinckley– Stanley Black & Decker
Andy Kolesar – Thompson Hine

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 1 OF 2

IHSB SITE NAME Portion of Stanley Fastening ID# NONCD0002531

DATE & NAME OF DOCUMENT April 15, 2016 RIWP Addendum

TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Kathryn E. Hinckley, Stanley Black & Decker
Name of Remediating Party

[Signature]
Signature of Remediating Party

4/8/2016
Date

NOTARIZATION

CONNECTICUT (Enter State)

HARTFORD COUNTY

I, MONA ZDUN, a Notary Public of said County and State, do hereby certify that Kathryn E. Hinckley did personally appear and sign before me this day, produced proper identification in the form of company ID, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 8th day of APRIL, 2016.

[Signature]
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 7/31/20

MONA V. ZDUN
NOTARY PUBLIC
MY COMMISSION EXPIRES JULY 31, 2020

IHSB SITE NAME Portion of Stanley Fastening ID# NONCD0002531DATE & NAME OF DOCUMENT April 15, 2016 RIVVP AddendumTYPE OF SUBMITTAL (circle all that apply): Report, Work plan Work Phase Comp. Statement, Schedule Change**REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES**

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

William M. Bremen

Name of Registered Site Manager

William M. Bremen

Signature of Registered Site Manager

4/14/16

Date

REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act N.C.G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

William M. Bremen

Name of Registered Site Manager

William M. Bremen

Signature of Registered Site Manager

4/14/16

Date

NOTARIZATIONNC (Enter State)Wake COUNTY

I, Anna-Maria Tate, a Notary Public of said County and State, do hereby certify that William M. Bremen did personally appear and sign before me this day, produced proper identification in the form of NCDL, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 14th day of April, 2016.Anna-Maria Tate

Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 8-21-18